

United States District Court
For the District of Rhode Island (Providence)

United States of America : Case NO 1:18-CR-00039(WES)
V. :
Billie R. Schofield, Defendant :

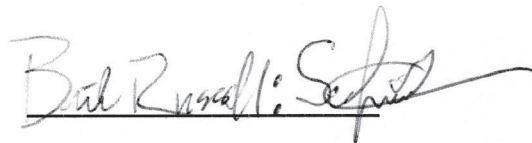
**Motion for Extension to File Reply Brief to Government's Opposition to
Compassionate Release**

AND NOW COMES, defendant, Billie R. Schofield (Defendant), pro se, through and by himself, requesting that this Honorable Court extend the time for Defendant to file a reply brief to the Government's opposition to Defendant's "Motion for Compassionate Release", and avers the following:

1. Defendant is waiting for additional medical records.
2. Defendant is experiencing problems with the delivery of mail via the United States Postal Service.
3. Defendant has very limited time afforded to him for use of the Law Library, and has no meaningful assistance from Library workers. [Who are not trained in Law], and minimal use of legal resources to perfect brief. (Bounds v. Smith)

WHEREFORE, for the aforementioned reasons set forth as above, Defendant prays that this Honorable Court grant him a 30 day extension to obtain the additional medical records and file his reply brief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Billie R Schofield". The signature is written in a cursive style with a long, sweeping horizontal line extending to the right.

Billie R Schofield, Pro SE

Tallahatchie County Corr. Facility

19351 U.S. Hwy. 49 North

Tutwiler, MS 389-5249

Dated May 26, 2021

Verification/Declaration

COMES NOW, Billie Russell: Schofield, declaring under penalty of perjury,

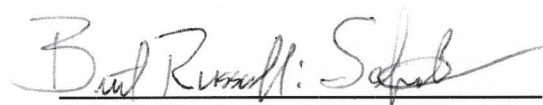
Pursuant to **28 U.S.C. § 1746** that “all the facts stated in the foregoing **“Defendants Motion for Extension to File Reply Brief to Government’s Opposition to Compassionate Release”** are absolutely true and correct to the very best of my knowledge and belief, that I have personal knowledge of almost every fact alleged, that they are material, admissible, and that I am competent to testify thereto.

Further, not knowing whether Rhode Island, where I live technically is “within” or “without” “the United States”, since that entity has been defined in many varying ways. I request that the Court make that determination.

That said, if Rhode Island is “without” “the United States”, as that entity is defined by this Court: “I declare (or certify, verify, and state) under penalty of perjury, **pursuant 28 U.S.C § 1746** that every material fact and inference derived there from presented in the foregoing document, is true and correct”.

SO HELP ME GOD.

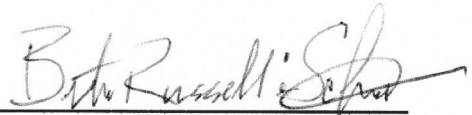
Executed on 26 May 2021

A handwritten signature in cursive script, reading "Billie Russell: Schofield", written over a horizontal line.

Billie Russell: Schofield

Certificate of Service

I certify that on 26 May 2021, I filed this **"MOTION FOR EXTENSION TO FILE REPLY BRIEF TO GOVERNMENT'S OPPOSITON FO COMPASSIONATE RELEASE"** by email, in accordance with COVID-19 protocols, and that the participants in the case that are registered CM/ECF users will be served electronically the CM/ECF system.

A handwritten signature in black ink, appearing to read "Billie Russell Schofield", written over a horizontal line.

Billie Russell: Schofield

Dated 26 May 2021